

## INITIAL CONFERENCE QUESTIONNAIRE

- |       |  |   |                                     |
|-------|--|---|-------------------------------------|
| 1.    | Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page):    |   | January 31,2020                     |
| 2.    | Deadline for first request for production of documents and first request for interrogatories:  |   | February 27, 2020                   |
| 2(a). | Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for:  | plaintiff(s) <sup>0</sup> _____ ; defendant(s) <sup>5</sup> _____ |                                     |
| 3.    | Date for completion of any joinder of additional parties and amendment of the pleadings:   |   | March 27, 2020                      |
| 3(a). | Number of proposed additional parties to be joined, if any, by:  | plaintiff(s) <u>  1  </u> ; defendant(s) <u>  1  </u>             |                                     |
| 4.    | Number of depositions by plaintiff(s) of:  | parties <u>  2  </u> ; non-parties <u>  1  </u>                   |                                     |
| 5.    | Number of depositions by defendant(s) of:  | parties <u>  2  </u> ; non-parties <u>  1  </u>                   |                                     |
| 6.    | Date of <u>status conference</u> (joint status report due two business days in advance):   |   | June 30, 2020                       |
| 7.    | Date for completion of factual discovery:  |   | June 23, 2020                       |
| 8.    | Are expert witnesses needed?   |   | Yes ____ No <u>X</u>                |
| 8(a). | Number of expert witnesses, if any, of plaintiff(s):   | medical _____ ; non-medical _____                                 |                                     |
| 8(b). | Date for completion of those expert reports:   |   | _____                               |
| 8(c). | Number of expert witnesses, if any, of defendant(s):   | medical _____ ; non-medical _____                                 |                                     |
| 8(d). | Date for completion of those expert reports:   |   | _____                               |
| 9.    | Date for completion of expert discovery:   |   | _____                               |
| 10.   | Date of <u>pretrial conference</u> (brief <i>ex parte</i> statements of settlement position due via email two business days in advance): |   | July 30, 2020                       |
| 11.   | Types of contemplated dispositive motions by plaintiff(s) <u>and</u> dates for filing of those motions:                                  |   | Summary Judgement<br>August 7, 2020 |

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: Summary Judgment  
August 7, 2020
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes X No
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes      No X
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes      No X